

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL J. PYLE and CANDY PYLE,

Plaintiffs,

v.

THE NATIONAL FOOTBALL LEAGUE,  
NFL PROPERTIES, LLC,

Defendants.

Case No. 12-cv-6493

ECF Case

Referred to: Judge Katherine B. Forrest

**NOTICE OF MOTION TO STAY**

PLEASE TAKE NOTICE THAT, upon the supporting memorandum of law and Declaration of Douglas M. Burns with attached exhibits, defendants the National Football League and NFL Properties, LLC shall move this Court, before the Honorable Katherine B. Forrest, at the United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 15A, at a date and time to be determined by the Court, for an order staying this action pending a decision by the Judicial Panel on Multidistrict Litigation whether this case should be transferred to the Eastern District of Pennsylvania to become part of In re: National Football League Players' Concussion Injury Litigation, 12-md-2323 (E.D. Pa.), as a "tag-along" action pursuant to J.P.M.L. Rule 7.1.

Dated: New York, New York  
August 28, 2012

Respectfully submitted,

PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP

By: /s/ Brad S. Karp  
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*Attorneys for the NFL Defendants*

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury, pursuant to 28 U.S. C. § 1746, that on August 28, 2012 I caused to be served upon the following, by First Class U.S. Mail, postage prepaid, a true copy of the Notice of Motion to Stay:

Gene Locks  
Locks Law Firm PLLC  
747 Third Avenue, 37<sup>th</sup> Floor  
New York, NY 10017

*Attorneys for Plaintiffs*

/s/ Douglas M. Brun